

Peter Richardson ISB #3195
Gregory M. Adams ISB #7454
RICHARDSON ADAMS, PLLC
515 N. 27th Street
Boise, Idaho 83702
Telephone: (208) 938-7901
peter@richardsonadams.com
greg@richardsonadams.com
Attorneys for the Amalgamated Sugar Company LLC

RECEIVED
2016 SEP 22 AM 11:13
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF INTERMOUNTAIN)	
GAS COMPANY'S APPLICATION TO)	CASE NO. INT-G-16-02
CHANGE ITS RATES AND CHARGES FOR)	
NATURAL GAS SERVICE IN THE STATE OF)	PETITION TO INTERVENE
IDAHO)	OF THE AMALGAMATED SUGAR
)	COMPANY LLC
)	
)	

COMES NOW, The Amalgamated Sugar Company, LLC, hereinafter referred to as "Intervenor," and pursuant to this Commission's Rules of Procedure, Rule 71 IDAPA 31.01.01.71 and pursuant to that Notice of Application and Notice of Intervention Deadline issued by the Commission on September 9, 2016, and hereby petitions the Commission for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

The Amalgamated Sugar Company LLC
Scott Dale Blickenstaff
1951 S. Saturn Way, Ste. 100
Boise, Idaho 83702
Telephone: (208) 383-6584
sblickenstaff@amalsugar.com

Copies of all pleadings, discovery and other documents should be served on Mr.

Blickenstaff and Richardson Adams, PLLC at the addresses noted above.

2. This Intervenor, The Amalgamated Sugar Company LLC is a Delaware Corporation duly qualified to do business in the State of Idaho. Amalgamated Sugar Company receives natural gas utility services from Intermountain Gas Company at all three of its Idaho sugar refinery operations located in Nampa, Twin Falls and Mini Cassia. Amalgamated Sugar claims a direct and substantial interest in this proceeding in that its costs for said natural gas utility services will be affected by the outcome of this proceeding.


3. This Intervenor, intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

4. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on its cost for natural gas services.

5. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

WHEREFORE, The Amalgamated Sugar Company LLC respectfully requests that this Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

DATED this 22nd day of September, 2016.


Peter J. Richardson
RICHARDSON ADAMS, PLLC
Attorneys for the Amalgamated Sugar
Company LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd day of September, 2016, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE AMALGAMATED SUGAR COMPANY LLC was served by Electronic and U.S. Mail:

Michael P. McGrath
Director, Regulatory Affairs
Intermountain Gas Company
555 S. Cole Road
PO Box 7608
Boise, ID 83707
mike.mcgrath@intergas.com

Chad M. Stokes
Tommy A. Brooks
Cable Huston LLP
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
cstokes@cablehuston.com
tbrooks@cablehuston.com

Benjamin J. Otto
Idaho Conservation League
710 N. 6th Street
Boise, Idaho 83702
botto@idahoconservation.org

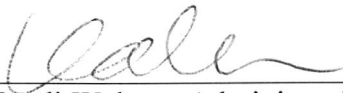
Ronald L. Williams
Attorney for Intermountain Gas Company
1015 West Hays Street
Boise, Idaho 83702
ron@williamsbradbury.com

Michael C. Creamer
Givens Pursley, LLP
601 West Bannock Street
Boise, Idaho 83702
mcc@givenspursley.com

Brad M. Purdy
2019 N. 17th Street
Boise, Idaho 83702
bmpurdy@hotmail.com

F. Diego Rivas
NW Energy Coalition
1101 8th Ave.
Helena, MT 59601
diego@nwenergy.org

Edward Finklea
Northwest Industrial Gas Users
545 Grandview Drive
Ashland, OR 97520
efinklea@nwigu.org

By: 
Kandi Walters, Administrative Assistant
Richardson Adams, PLLC